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Attorney for Defendant:  
 ANDREA NEAL PICKRELL

IN THE UNITED STATES DISTRICT COURT  
 IN AND FOR THE NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	No. CR-04-00407-MMC
	)	
Plaintiff,	)	STIPULATION AND <del>PROPOSED</del>
	)	ORDER CONTINUING SENTENCING
vs.	)	HEARING FROM SEPTEMBER 27,
	)	2006 TO DECEMBER 13, 2006 AND
ANDREA NEAL PICKRELL, et. al,	)	EXCLUDING TIME UNDER THE
	)	SPEEDY TRIAL ACT
Defendants.	)	

The parties appeared before the Court on May 17, 2006 for a change of plea. At that time, the Court set the date for judgment and sentencing to September 27, 2006. Due to an unforeseen family emergency concerning a gravely ill parent, Ms. Pickrell's counsel was not available to attend the probation interview or otherwise properly prepare for the sentencing hearing.

The parties therefore stipulate and request the Court to continue the sentencing date from September 27, 2006 to December 13, 2006, in order to provide the necessary time for the probation officer, Ann Searles, to conduct her interview and for the parties to complete their sentencing memoranda and preparation for hearing in an orderly fashion. Given the need to conduct the probation interview and the preparation of sentencing memoranda, the parties stipulate that the time from September 27, 2006 to December 13, 2006 is properly excludable for effective preparation and continuity of counsel.

1 IT IS SO STIPULATED.

2 DATED: \_\_\_\_\_

3 /s/ \_\_\_\_\_  
4 DAVE HALL  
Assistant United States Attorney

5 DATED: \_\_\_\_\_

6 /s/ \_\_\_\_\_  
7 GERI LYNN GREEN  
Attorney for Andrea Pickrell

8 IT IS SO ORDERED. The sentencing hearing will be continued from September 27, 2006  
9 to December 13, 2006 at 2:30 p.m. For the reasons set forth above, the time is excludable from  
10 the Speedy Trial Act on the grounds of effective preparation and continuity of counsel.

11 DATED: September 25, 2006

12   
13 THE HON. MAXINE M. CHESNEY  
14 United States Chief District Judge

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